

# Luceco Plc – UK Tax Strategy

**Effective for the financial year ending 31 December 2026**

## 1. Introduction

This document sets out the UK tax strategy of Luceco Plc and its UK subsidiaries (together, the “Group”), in accordance with the requirements of **Schedule 19 of the Finance Act 2016**.

The strategy applies to all UK taxes and duties as set out in paragraph 15(1) of the above Schedule, which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, Stamp Duty Land Tax, and other relevant duties and levies. It is reviewed annually and approved by the Board of Directors.

## 2. Governance and Oversight

The Board has ultimate responsibility for the Group’s tax strategy and risk management framework.

Day-to-day responsibility for tax matters is delegated to the Chief Financial Officer and the Group Head of Treasury and Tax, who:

- Ensures compliance with UK tax legislation
- Monitors changes in tax law and HMRC guidance
- Reports material tax risks to senior management and the Board
- Oversees relationships with external advisers and HMRC

Appropriate internal controls are maintained to ensure tax filings are accurate, complete, and submitted on time.

## 3. Risk Management and Appetite

The Group adopts a **low-risk approach** to tax matters and a zero-tolerance approach to tax evasion and the facilitation of tax evasion.

The Group seeks to:

- Comply fully with all applicable rules, regulations and disclosure requirements of UK tax law.
- Avoid unnecessary tax risk or uncertainty
- Maintain transparency and consistency in tax positions
- Adhere to OECD guidelines relating to the tax treatment of cross border transactions with connected parties;

- Pay the correct amount of tax as it falls due
- Review the availability of and claim tax incentives available to the Group where relevant to its commercial activities, ensuring that these are claimed with consideration to both the letter and spirit of the relevant legislation;
- Protect its reputation as a responsible UK taxpayer

Tax risks are identified, assessed, and managed as part of the Group's wider risk management framework. Where uncertainty exists, the Group may seek:

- Professional external advice
- Non-statutory clearance from HMRC
- Advance discussions with HMRC where appropriate

The Group does **not** engage in artificial or contrived tax arrangements that lack commercial substance.

#### **4. Approach to Tax Planning**

The Group undertakes tax planning only where it:

- Supports genuine commercial activity
- Aligns with the Group's business objectives
- Is consistent with applicable legislation and HMRC guidance

Tax planning opportunities arising from government-introduced reliefs, incentives, and allowances (such as capital allowances or R&D reliefs) may be utilised where relevant and appropriate.

The Group does not pursue aggressive tax planning or arrangements that could damage its reputation or relationship with stakeholders.

#### **5. Relationship with HMRC**

The Group seeks to maintain an **open, honest, and constructive relationship** with HMRC.

This includes:

- Timely and accurate tax filings
- Transparent disclosure of relevant facts
- Prompt responses to HMRC queries
- Professional and cooperative conduct during audits or reviews

Where disagreements arise, the Group aims to resolve matters through dialogue and, where necessary, established dispute resolution procedures.

## **6. Use of External Advisers**

The Group engages external tax advisers where appropriate to:

- Provide specialist or technical advice
- Interpret complex or evolving tax legislation
- Support compliance and reporting obligations

Advisers are selected based on professional competence, integrity, and alignment with the Group's tax principles.

## **7. Compliance and Reporting**

The Group is committed to:

- Filing all tax returns accurately and on time
- Paying the right amount of tax in the correct jurisdiction
- Maintaining adequate documentation to support tax positions

Systems and processes are periodically reviewed to ensure continued compliance and effectiveness.

## **8. Publication and Review**

This tax strategy is published on the Group's website in accordance with statutory requirements and will remain accessible for at least one year.

The strategy is reviewed annually and updated as necessary to reflect changes in legislation, business operations, or risk appetite.

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**Approved by the Board of Directors**

**Luceco Plc**

**Date: 14<sup>th</sup> January 2026**